

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

SHOSHANA HEBSHI,)	
Plaintiff,)	
)	
v.)	Case No. 13-10253
)	
UNITED STATES OF AMERICA, et al,)	Hon. Terrence G. Berg
)	
)	Hon. Laurie J.
)	Michelson (Settlement)
Defendants.)	
)	

PLAINTIFF'S MOTION TO VOLUNTARILY DISMISS

The parties having settled the above-captioned action, Plaintiff respectfully moves this Court to dismiss with prejudice the above-captioned action against all Defendants. Each Party shall bear its own costs, expenses, and fees. In accordance with Rule 7.1(a) of the Local Rules of the Eastern District of Michigan, Plaintiff's counsel certifies that all Defendants concur in this request. Attached as Exhibit A is a Proposed Order of Dismissal.

Respectfully submitted,

/s/Rachel E. Goodman

Rachel E. Goodman
Dennis Parker
American Civil Liberties Union
Foundation
125 Broad Street, 18th Floor
New York, NY 10004
(212) 549-2500
rgoodman@aclu.org
dparker@aclu.org
Attorneys for Plaintiff

Sarah E. Tremont (P73809)
Covington & Burling LLP
1201 Pennsylvania Ave., N.W.
Washington D.C. 20004
(202) 662-6000
aengh@cov.com
stremont@cov.com
Attorneys for Plaintiff

Michael J. Steinberg (P43085)
Kary L. Moss (P49759)
Brooke A. Merriweather-Tucker
American Civil Liberties Union
Fund of Michigan
2966 Woodward Avenue
Detroit, MI 48201
(313) 578-6823
msteinberg@aclumich.org
kmoss@aclumich.org
Attorneys for Plaintiff

William H. Goodman (P14173)
Julie H. Hurwitz (P34720)
Kathryn Bruner James (P71374)
Miriam R. Nemeth (P76789)
Goodman & Hurwitz, P.C.
Cooperating Attorneys, American Civil
Liberties Union Fund of Michigan
1394 E. Jefferson Ave.

Detroit, MI 48207
(313) 567-6170
bdoodman@goodmanhurwitz.com
jhurwitz@goodmanhurwitz.com
kjames@goodmanhurwitz.com
mnemeth@goodmanhurwitz.com
Attorneys for Plaintiff

Dated: April 21, 2015